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Counsel for Defendants Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, Kimberly Yvette Smith, M.D., a/k/a Kimberly Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Rhaul Shah, M.D., John Catalano, M.D., Richard C. DiVerniero, M.D., and Richard Strauss, M.D.

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

ALL CASES

MDL No. 2419
Docket No. 1:13-md-2419 (RWZ)

**PREMIER ORTHOPAEDIC ASSOCIATES, ET AL'S MOTION TO ALLOW THE
DEPOSITION OF JOSEPH CONNOLLY**

Please accept this submission on behalf of the Premier Defendants in response to the United States Attorney's recent submission to stay the deposition of Joseph Connolly, scheduled for tomorrow. This office has made travel arrangements to arrive in Boston tomorrow morning for the deposition of Joe Connolly. Canceling or changing those reservations at this point will come at a significant cost. In scheduling these travel arrangements reliance was placed on the fact that the parties had not moved to stay the deposition until late yesterday evening. It is

therefore, respectfully requested that the deposition of Joe Connolly take place tomorrow as previously scheduled to avoid unnecessary delay and expense.

Dated: November 10, 2015

Respectfully submitted,

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CERTIFICATION

I certify that in submitting this *NOTICE*, I caused a copy of the above to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's System, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: November 10, 2015

/s/ Christopher M. Wolk
Christopher M. Wolk, Esq.